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September 22, 2006

Mr. Sam Chummar Remedial Project Manager Superfund Division U.S. EPA Region 5 (SR-6J) 77 West Jackson Boulevard Chicago, IL 60604-3590

Subject: Plainwell Mill Property, Plainwell, Michigan

August/September 2006 Progress Report

Dear Sam:

As required by Task 8, *Progress Reports*, in the Statement of Work for the RI/FS at the Plainwell, Inc., Mill Property, I am submitting the attached progress report for the period of August 17, through September 15, 2006, for the above-referenced site.

Please call me, at (253) 924-3746, if you have any questions.

n Hale

Sincerely,

Weyerhaeuser Company

Gennifer Hale

Environmental Manager

Attachments

cc: Shari Kolak, U.S. EPA

Paul Bucholtz, MDEQ (3 copies) John Gross, Weyerhaeuser Company Joe Jackowski, Weyerhaeuser Company

Mark Schneider, Perkins Coie Kathy Huibregtse, RMT, Inc. Linda Hicken, RMT, Inc. Cheryl Zuellig, JJR

Progress Report No. 1 August 17, through September 15, 2006

Remedial Investigation and Feasibility Study Plainwell, Inc., Mill Property, Plainwell, Michigan

This progress report is being submitted in accordance with Task 8, *Progress Reports*, and the *Schedule for Major Deliverables* contained in the Statement of Work for the RI/FS at the Plainwell, Inc., Mill Property.

- 1. Summary of Work Performed During the Current Reporting Period:
 - On July 12, a meeting/conference call was held among representatives of the U.S. EPA, the MDEQ, the City of Plainwell, and Weyerhaeuser to discuss Weyerhaeuser's proposed approach and rationale for integrating the remediation and redevelopment activities. The parties agreed that an integrated approach makes sense for this site
 - On July 26, a pre-QAPP meeting among representatives of the U.S. EPA and Weyerhaeuser was held (as required under Task 2 of the SOW) at the U.S. EPA's office in Chicago.
 - On August 16, the Statement of Work for the RI/FS for the Plainwell Mill was finalized by the U.S. EPA. Weyerhaeuser was notified of the U.S. EPA's approval of the SOW on August 17.
 - On September 14, a project meeting among representatives of the U.S. EPA and Weyerhaeuser
 was held (as suggested under Task 9 of the SOW) at the U.S. EPA's office in Chicago. The
 following is a synopsis of the subjects discussed:
 - The U.S. EPA stated that it has designated the Plainwell Mill as Operable Unit #6 of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
 - Weyerhaeuser representatives reported that discussions with the City regarding future land use were ongoing. Because a reuse plan has not yet been agreed upon, the RI data collection activities will be based on the Reuse Plan developed by Ecology & Economics, Inc. (E²), in 2004 and 2005 under the U.S. EPA Superfund Redevelopment Initiative. Weyerhaeuser representatives noted that, if the final land use plan agreed upon with the City is substantially different from the Plan prepared by E², then additional data may need to be collected. The parties agreed that additional data could be collected as either an addendum to the RI or as a predesign activity.
 - Weyerhaeuser representatives presented a summary of the historical operations conducted at the site, the scope and findings of the previous site assessments and site investigations, and the RI data collection activities planned by Weyerhaeuser.
 - Weyerhaeuser representatives presented the rationale for not expecting adverse impacts to ambient air based on current and historical land use (i.e., the historical data did not show high concentrations of VOCs in soil or groundwater, or high levels of lead in near-surface soil; the site has a mature vegetated surface; and surface soil is not being disturbed under current land use). The ambient air pathway will be assessed by comparing the RI data for

near-surface soil samples with appropriate Michigan Part 201 criteria for inhalation of volatile substances and particulate matter. Soil samples to be analyzed for lead will be analyzed for fine-grained and coarse-grain fractions.

- 2. Summary of Data Collected During the Current Reporting Period:
 - On September 5 and 6, the City of Plainwell collected soil and groundwater samples on the site as part of a Phase II Environmental Site Assessment and Baseline Environmental Assessment for the property being conducted under the State of Michigan's environmental remediation program (i.e., the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended [NREPA]).
 - No data were collected by Weyerhaeuser during the current reporting period
- 3. Summary of Activities Undertaken in Support of the Community Relations Plan (completed during the current reporting period and anticipated during the next period):
 - No activities were undertaken during the current reporting period, and none are anticipated during the next period
- 4. Summary of Any Modifications to the Work Plans or Other Schedules Proposed To, or Approved By, the U.S. EPA:
 - None.
- 5. Summary of Problems Encountered During the Current Reporting Period:
 - None
- 6. Summary and Schedule of Work Anticipated During the Next Reporting Period:
 - On or before October 2, Weyerhaeuser will submit the Draft RI/FS Work Plan and the Draft Sampling and Analysis Plan to the U.S. EPA for review (as required under Tasks 1 and 2 of the SOW).
- 7. Anticipated Problems Associated with Work During the Next Period:
 - None
- 8. Planned Resolution of Past or Anticipated Problems:
 - None are needed
- 9. Other Relevant Information:
 - On August 17, Weyerhaeuser notified the U.S. EPA of the City's intent to mow the grass and remove weeds on the mill property. The U.S. EPA agreed that surficial landscaping was acceptable.
 - On August 30, the City obtained ownership of the mill property.